

Scott H. Bernstein
HUNTON & WILLIAMS LLP
200 Park Avenue, 53rd Floor
New York, New York 10166-0136
(212) 309-1000

-and-

Kevin M. Eckhardt (admission pending)
HUNTON & WILLIAMS LLP
1111 Brickell Avenue, Suite 2500
Miami, Florida 33131
(305) 810-2500

Attorneys for Catalana Occidente RF1, F.P.

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

| | | |
|---|---|-------------------------|
| -----X | | |
| In re | : | Chapter 11 |
| | : | |
| | : | Case No. 08-13555 (JMP) |
| LEHMAN BROTHERS HOLDINGS, INC., <i>et al.</i> , | : | |
| | : | (Jointly Administered) |
| Debtors. | : | |
| -----X | | |

NOTICE OF APPEARANCE AND REQUEST FOR SERVICE OF PAPERS

PLEASE TAKE NOTICE that Catalana Occidente RF1, F.P., by and through its undersigned counsel, hereby enters a notice of appearance pursuant to Rule 9010(b) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”) and section 1109(b) of Title 11 of the United States Code (the “Bankruptcy Code”).

PLEASE TAKE FURTHER NOTICE that Catalana Occidente RF1, F.P. hereby requests, pursuant to Bankruptcy Rule 2002 and Bankruptcy Code section 1109(b), that copies of all notices and pleadings given, and all papers served or required to be served, be given and served upon the following persons at the address, telephone number, facsimile number and e-mail address indicated:

Scott H. Bernstein
HUNTON & WILLIAMS LLP
200 Park Avenue, 53rd Floor
New York, New York 10166
Telephone: (212) 309-1000
Facsimile: (212) 309-1100
Email: sbernstein@hunton.com

Kevin M. Eckhardt
HUNTON & WILLIAMS LLP
1111 Brickell Avenue, Suite 2500
Miami, Florida 33131
Telephone: (305) 810-2500
Facsimile: (305) 810-2460
Email: keckhardt@hunton.com

PLEASE TAKE FURTHER NOTICE that, pursuant to Bankruptcy Code section 1109(b), the foregoing demand includes not only the notices and papers referred to in the Bankruptcy Rules specified above, but also includes, without limitation, all orders and notices of any applications, petitions, motions, complaints, requests or demands, hearings, answering or reply papers, memoranda, and briefs in support of any of the foregoing and any other document filed with, or otherwise brought before, this Court with respect to the above-referenced bankruptcy proceeding, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, courier service, hand delivery, telephone, facsimile transmission, telegraph, telex, e-mail or otherwise.

PLEASE TAKE FURTHER NOTICE that Catalana Occidente RF1, F.P. intends neither this Notice of Appearance and Request for Service of Papers nor any later appearance, pleading, claim or suit shall waive (i) Catalana Occidente RF1, F.P.'s right to have final orders in non-core matters entered only after *de novo* review by a District Court Judge, (ii) Catalana Occidente RF1, F.P.'s right to trial by jury in any proceeding so triable in any case, controversy, or proceeding related to this bankruptcy proceeding, (iii) Catalana Occidente RF1, F.P.'s right to

have the United States District Court for the Southern District of New York withdraw the reference in any matter subject to mandatory or discretionary withdrawal, or (iv) any other rights, claims, actions, defenses, setoffs, or recoupments to which Catalana Occidente RF1, F.P. is or may be entitled under agreements, in law or in equity, including the right to contest the jurisdiction of the United States Bankruptcy Court for the Southern District of New York over Catalana Occidente RF1, F.P., all of which rights, claims, actions, defenses, setoffs, and recoupments Catalana Occidente RF1, F.P. expressly reserves.

Dated: New York, New York
February 3, 2009

HUNTON & WILLIAMS LLP

/s/ Scott H. Bernstein
Scott H. Bernstein
200 Park Avenue, 53rd Floor
New York, New York 100166-0136
Telephone: (212) 309-1000
Telecopier: (212) 309-1100

-and-

Kevin M. Eckhardt (admission pending)
1111 Brickell Avenue, Suite 2500
Miami, Florida 33131
Telephone: (305) 810-2500
Telecopier: (305) 810-2460

Attorneys for Catalana Occidente RF1, F.P.